

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SVOTHI, INC.,

Plaintiff-Counterclaim Defendant,

v.

No. 25 CV 0333 (ALC)

DARK ALLEY MEDIA, LLC and  
ROBERT FELT

Defendants-Counterclaim Plaintiffs.

**DECLARATION OF WESLEY M. MULLEN**

I, Wesley M. Mullen, declare as follows:

1. By and through the entity incorporated as Mullen P.C., I am counsel of record to Plaintiff-Counterclaim Defendant SVOTHI Inc. in this case.
2. I make this declaration in support of SVOTHI's opposition to Defendants-Counterclaim Plaintiffs' motion for a preliminary injunction, and to place relevant documents before the Court.
3. Based on the evidence set forth in this declaration and in the accompanying declaration; and the argument set forth in Plaintiff's accompanying Memorandum of Law; and all other evidence and argument presented at a hearing or as the Court may otherwise see fit to hear in connection with this application, I request that the Court deny Defendants-Counterclaim Plaintiffs' Motion.
4. Annexed as **Exhibit A** is a true and correct copy of the Demand for Arbitration filed by Respondent before JAMS on January 16, 2025.
5. Annexed as **Exhibit B** is a true and correct copy of an email from JAMS dated February 6, 2025 informing the parties that it would not administer arbitration because

“JAMS is not named in the arbitration clause in this matter and [because] Respondent [VideoApp] does not wish to proceed.”

6. Annexed as **Exhibit C** is a true and correct copy of a Summons and Complaint filed by Defendants against VideoApp in Supreme Court, New York County, on January 31, 2025.

7. Annexed as **Exhibit D** a true and correct copy of a Petition filed by VideoApp Inc. against Dark Alley Media, LLC in Supreme Court, New York County, on February 5, 2025, along with excerpts of the publicly-filed materials submitted in support of the Petition.

8. The following is a true and correct reproduction of a post from the Twitter account of Dark Alley and its principal, Mr. Felt, (@owenhawkxxx), which is dated February 2, 2025:



← Post

Owen Hawk  @OwenHawkXXX

H It honestly is a little surreal to be living in this timeline where I have a federal case, a state case, and an arbitration case all open at the same time. I never foresaw this future for myself. And it's quite strange, honestly, very strange. For anyone that's interested in this, I did a 10-minute TikTok explaining the lawsuits, - the trifecta of hell- that I'm currently involved in [tiktok.com/@owenhawknyc](https://tiktok.com/@owenhawknyc)/v...

4:16 PM · Feb 2, 2025 · 9,721 Views

2 43 5 1

9. The following is a true and correct reproduction of a post from the Twitter account of Dark Alley and its principal, Mr. Felt, (@owenhawkxxx), which is dated January 3, 2025:



**Owen Hawk**  @OwenHawkXXX

I will never understand why Damian Todaro, a conflict avoidant beta, chose this man to run @rawfuckclub customer service because he is as mentally stable as a Jenga tower in an earthquake .

“Elvis” who’s has one eye after a prison fight and was arrested trying to escape fire island in drag, has been nonstop harassing us, making false DMCA reports on our films crating multiple accounts to do this and get around blocking him.

So yes, fuck @rawfuckclub and especially the weak beta male Damian who runs it. [x.com/f4gsXXX/status...](https://x.com/f4gsXXX/status...)

This post is unavailable.

Last edited 9:40 PM · Jan 3, 2025 · 27.7K Views

4 replies · 1 retweet · 18 likes · 2 bookmarks

10. The following is a true and correct reproduction of a post from the Twitter account of Dark Alley and its principal, Mr. Felt, (@owenhawkxxx), which is dated January 3, 2025:



**Owen Hawk**  @OwenHawkXXX

Nothing you say or do will have any impact on what happens. Lie all you want. DMCA us to death. It won’t matter. The complaint will be filed, Damian will be held to account. You are powerless and immaterial, if anything the lies and harassment will help us prove bad faith.

I’m shocked that neither Damian or your lawyer has put a muzzle on you and let you keep running around taking dumps on the carpets.

11:43 PM · Jan 3, 2025 · 723 Views

1 reply · 1 retweet · 1 like · 1 bookmark

11. The following is a true and correct reproduction of a post from the Twitter account of Dark Alley and its principal, Mr. Felt, (@owenhawkxxx), which is dated February 6, 2025:

**Owen Hawk** 9.1K posts

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**Owen Hawk** @OwenHawkXXX · 20m ...  
Yo, Wesley, if you're reading this your guy fucked, like really really fucked

Just remember that before all this went down I offered an out. Y'all wouldn't fucking take it too stubborn and too stupid.

And none of this was fucking necessary so think on that

1 12 1.3K

**Owen Hawk** @OwenHawkXXX · 24m ...  
Prison, honey

0 4 723

12. The following is a true and correct reproduction of a post from the Twitter account of Dark Alley and its principal, Mr. Felt, (@owenhawkxxx), which is dated February 4, 2025:

X

← Post

⚙️

**Owen Hawk** @OwenHawkXXX

I spoke with a reporter from @Independent today and expect a story on the disputes surrounding @rawfuckclub to be published soon.

I appreciate any attention on this issue and remain hopeful that PPV Networks deceitful and malicious actions—and those of their employees—will fully come to light.

Last edited 6:22 PM · Feb 4, 2025 · 1,837 Views

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13. As referenced in the Twitter post depicted above at paragraph 12, an article quoting Mr. Felt and concerning Dark Alley's various litigation maneuvers was published on February 5, 2025. J. Rohrlich, [Porn star says his career was destroyed by false claims he nearly killed a dog with meth](#), INDEPENDENT (February 5, 2025) (last visited February 5, 2025). A true and correct copy of the published article is annexed as **Exhibit E**.

14. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 12, 2024



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Wesley M. Mullen